

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION**

KELLY BLAND, individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

DIGITAL INSURANCE LLC d/b/a One  
Digital,

Defendant.

Case No.: 7:25-cv-00050-O

Hon. Reed C. O'Connor

**JOINT MOTION TO EXTEND DEADLINE TO  
SUBMIT JOINT SCHEDULING REPORT**

The parties jointly ask that the Court extend their deadline to submit a joint scheduling report by 10 days (from July 8 to July 18, 2025).

1. The parties' current deadline to submit a joint scheduling report is July 8, 2025. *See* ECF No. 10.

2. The parties timely conducted their case management conference and are in the process of sharing relevant information (informally) and discussing the proper schedule for this case. But they need additional time to finalize the report given other professional and personal commitments and the intervening July 4 holiday. Counsel for each party, for example, will be out of the office with their respective families for most of the July 4 week.

3. The above reasons constitute good cause to briefly extend the deadline to submit a joint scheduling report by 10 days. *See* ECF No. 10 at 4 (permitting extensions for good cause).

The parties accordingly ask that the Court grant this motion and briefly extend their deadline to submit a joint scheduling report through July 18, 2025.

Dated: June 30, 2025

By: /s/ Theodore Kwong

Theodore Kwong  
Texas State Bar No. 24087871  
HILGERS GRABEN PLLC  
7859 Walnut Hill Lane, Ste. 335  
Dallas, Texas 75230  
Telephone: 972-666-3646  
Facsimile: 402-413-1880  
[tkwong@hilgersgraben.com](mailto:tkwong@hilgersgraben.com)

Ryan D. Watstein\*  
Matthew A. Keilson\*  
WATSTEIN TEREPAK LLP  
1055 Howell Mill Road, 8th Floor  
Atlanta, GA 30318  
Telephone: 404-782-0695  
[ryan@wtlaw.com](mailto:ryan@wtlaw.com)

\* Pro hac vice forthcoming

*Counsel for Defendant*

By: /s/ Anthony I. Paronich\*

Anthony I. Paronich  
Paronich Law, P.C.  
350 Lincoln Street, Suite 2400  
Hingham, MA 02043  
(508) 221-1510  
[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)

Andrew Roman Perrong, Esq.  
Perrong Law LLC  
2657 Mount Carmel Avenue  
Glenside, Pennsylvania 19038  
Phone: 215-225-5529 (CALL-LAW)  
Facsimile: 888-329-0305  
[a@perronglaw.com](mailto:a@perronglaw.com)

\*with permission

*Counsel for Plaintiff*

**CERTIFICATE OF CONFERRAL**

I certify that I conferred with Plaintiff's counsel about the foregoing motion. Plaintiff joins in the request for relief.

/s/ Matthew A. Keilson

Matthew A. Keilson

**CERTIFICATE OF SERVICE**

I hereby certify that on June 30<sup>th</sup>, 2025, I caused a true and correct copy of the foregoing to be filed with the Clerk of Court using the CM/ECF system, which will send notice of the electronic filing to all counsel of record.

/s/ Theodore Kwong

Theodore Kwong